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Via ECF

Honorable Mark Falk, U.S.M.J.
United States District Court
Martin Luther King Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

***Re: 1266 Apartment Corporation d/b/a Horizon House vs.
Greater New York Mutual Insurance Company
Civil Action No. 2:17-cv-12796 (CCC-MF)***

Dear Magistrate Falk:

We have received plaintiff's request for another two-month extension of the deadline for its experts' reports, and we wish to be heard on the subject. Accordingly, we join in plaintiff's request for a conference.

Plaintiff bases its request for a second two-month adjournment (this Court previously extended the date for plaintiff's reply reports by 2 months with GNY's consent) in part because there is a problem with defendant's experts reports that "may need to be addressed in Plaintiff's expert report." Plaintiff's counsel has suggested the problem is that GNY's engineering experts are not licensed in New Jersey, yet the suggestion that a professional must be licensed in this state in order to serve as an expert is contrary to New Jersey law, Third Circuit law, and virtually every other jurisdiction as well. Further, it is not clear why plaintiff's engineering expert would have to address that issue in his report, and it is equally unclear why this issue would delay the service of plaintiff's other expert reports (public adjuster and meteorologist).

We wish to address these issues, and plaintiff's adjournment request, with Your Honor.

Respectfully submitted,
SCHENCK, PRICE, SMITH & KING, LLP
/s/ Jeffrey T. LaRosa
Jeffrey T. LaRosa

JTL/mor
cc: All Counsel of Record (Via ECF)